

THE HONORABLE THOMAS S. ZILLY

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON**

KEVIN PINE, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

A PLACE FOR MOM, INC., a Delaware  
corporation,

Defendant.

Case No. 17-cv-1826

**JOINT STIPULATED MOTION AND  
[PROPOSED] ORDER TO SEAL  
PLAINTIFF'S REPLY IN SUPPORT OF  
MOTION TO COMPEL DEFENDANT TO  
PRODUCE RELEVANT DISCOVERY (Dkt.  
96)**

**Noting Date: August 9, 2018**

1 Pursuant to Local Rules 5(g)(2) and 10(g), and the Stipulated Protective Order entered in  
2 this case (Docs. 68-69), Plaintiff Kevin Pine (“Plaintiff”) and Defendant A Place for Mom, Inc.  
3 (“Defendant”) (collectively, the “Parties”), by their respective attorneys, hereby submit this Joint  
4 Stipulated Motion to seal Plaintiff’s previously filed Reply in Support of Motion to Compel  
5 Defendant to Produce Relevant Discovery (Doc. 96) and replace it with a redacted version  
6 attached hereto as Exhibit A:

7 WHEREAS, on August 3, 2018, Plaintiff filed his Reply in Support of Motion to Compel  
8 Defendant to Produce Relevant Discovery (Doc. 96, hereafter the “Reply”);

9 WHEREAS, Defendant contends the Reply contains confidential material that runs afoul  
10 of the Stipulated Protective Order (Docs. 68-69); and

11 WHEREAS, in an effort to avoid unnecessary motion practice, the Parties have stipulated  
12 that, as a substitute for the already-filed Reply, Plaintiff will submit a proposed redacted version  
13 of the Reply for the public record for the Court’s consideration and request that the Court seal  
14 the already-filed Reply;

15 NOW THEREFORE, Plaintiff and Defendant hereby stipulate and respectfully request,  
16 subject to Court approval, that:

17 1. The Clerk of the Court seal Plaintiff’s previously filed Reply in Support of  
18 Motion to Compel Defendant to Produce Relevant Discovery (Doc. 96); and

19 2. The Clerk of the Court replace the previously filed Reply in Support of Motion to  
20 Compel Defendant to Produce Relevant Discovery (Doc. 96) with the redacted version of the  
21 brief attached to this Motion as Exhibit A.

22 It Is So Stipulated Through Counsel of Record,  
23  
24  
25  
26

A PLACE FOR MOM, INC.

KEVIN PINE

By: /s/ James F. Williams

By: /s/ Gary M. Klinger

James F. Williams, WSBA #23613  
**PERKINS COIE LLP**  
 1201 Third Avenue, Suite 4900  
 Seattle, WA 98101-3099  
 Phone: 206.359.8000  
 Email: JWilliams@perkinscoie.com

**KOZONIS & KLINGER, LTD.**  
 Gary M. Klinger  
 4849 N. Milwaukee Ave., Ste. 300  
 Chicago, Illinois 60630  
 Telephone: (312) 283-3814  
 Facsimile: (773) 496-8617  
 E-mail: gklinger@kozonislaw.com

**PERKINS COIE LLP**  
 James Snell  
 Email: JSnell@perkinscoie.com  
 3150 Porter Drive 134  
 Palo Alto, CA 94304-1212  
 Phone: (650) 799-7949

**LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
 Sharon M. Lee, WA Bar No. 37170  
 2101 Fourth Avenue, Suite 1900  
 Seattle, WA 98121  
 Telephone: (206) 739-9059  
 Facsimile: (415) 956-1008  
 E-mail: slee@lchb.com

*Attorneys for Defendant A Place for Mom, Inc.*

**LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
 Daniel M. Hutchinson  
 275 Battery Street, 29th Floor  
 San Francisco, CA 94111-3339  
 Telephone: (415) 956-1000  
 Facsimile: (415) 956-1008  
 E-mail: dhutchinson@lchb.com

**LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
 Jonathan D. Selbin  
 250 Hudson Street, 8th Floor  
 New York, NY 10013  
 Telephone: (212) 355-9500  
 Facsimile: (212) 355-9592  
 E-mail: jselbin@lchb.com

**LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
 John T. Spragens  
 222 2nd Ave S, Suite 1640  
 Nashville, TN 37201  
 Telephone: (615) 313-9000  
 Facsimile: (615) 313-9965  
 E-mail: jspragens@lchb.com

HUSSIN LAW FIRM  
Tammy Hussin  
1596 N. Coast Highway 101  
Encinitas, CA 92024  
Telephone: (877) 677-5397  
Facsimile: (877) 667-1547  
E-mail: tammy@hussinlaw.com

*Counsel for Plaintiff and the Proposed  
Class*

1 IT IS SO ORDERED.

2 Dated this \_\_\_\_ day of \_\_\_\_\_, 2018.

3  
4 \_\_\_\_\_  
5 HON. THOMAS S. ZILLY  
6 UNITED STATES DISTRICT JUDGE  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

Gary M. Klinger, an attorney, hereby certifies that he caused a copy of the foregoing to be served on all counsel of record by electronically filing the document with the Clerk of Court using the ECF system this 9th day of August, 2018.

s/ Gary M. Klinger  
Gary M. Klinger